

## REMARKS

The Examiner is thanked for the performance of a thorough search. By this amendment, Claims 55–57 are added. No claims have been amended or canceled. Hence, Claims 1–57 are pending in this application. All issues raised in the Office Action are addressed hereinafter.

### I. CLAIM REJECTIONS BASED ON 35 U.S.C. § 102

Claims 1–54 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Pub. No. 2004/0031030 A1 to Kidder et al. (hereinafter *Kidder*). Applicants respectfully traverse the rejection.

To anticipate under 35 U.S.C. § 102, a reference must show all elements, steps or limitations of a claim, arranged as in the claim. An anticipation rejection is unsupported or overcome if a reference is missing even one element, step, or limitation. *See Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548, 220 USPQ 193, 198 (Fed. Cir. 1983).

### INDEPENDENT CLAIM 1

Claim 1 presently recites:

A method for managing configuration data for a router, the method comprising the machine-implemented steps of:  
querying the router **to determine** a plurality of **functional areas supported by the router**;  
generating and displaying a plurality of user interface objects on a graphical user interface, wherein each user interface object from the plurality of user interface objects **corresponds to configuration data** for one of the plurality of functional areas supported by the router; and  
in response to detecting a user selection of a particular user interface object from the plurality of user interface objects,  
**allowing the user to modify the configuration data** corresponding to the particular user interface object to generate modified configuration data; and

sending the modified configuration data to the router.

Client software running at a computer on a network may implement the steps of Claim 1 to provide simplified management of multiple network devices. The client may be unaware of what functional areas the various network devices on the network support. Thus, the client may periodically query each network device on the network to determine what functional areas each network device supports. One such network device may be a router. The client may determine that the router supports, for example, functional areas for ACL and BGP. The client may then generate graphical user interfaces for configuration data corresponding to each of these supported functional areas. In response to detecting user selection of one of these interfaces, the client may allow the user to modify the configuration data for the corresponding functional area.

By contrast, *Kidder* discloses a network management system for a telecommunications network. *Kidder* at ¶ 109. The network management system (NMS) includes an interface that presents **an “interpretation” of status information** for each of the ISO’s five **pre-defined** functional areas of network management: Fault, Configuration, Accounting, Performance, and Security (FCAPS). *Kidder* at ¶¶ [0109], [0229], [0234]–[0237]. Only one of these pre-defined areas, the Configuration area, pertains to configuration data.

*Kidder* does not teach or suggest a number of features recited in Claim 1. For example, *Kidder* does not disclose **“determin[ing] a plurality of functional areas supported by the router.”** The Office Action alleges that *Kidder* discloses this step of determining functional areas in ¶ [0109]. However, ¶ [0109] merely states that, “to manage a network device,” *Kidder* gathers data “relevant to network configuration, security, accounting, statistics, and fault logging.” Gathering data is not the same as “determin[ing] a plurality of functional areas supported by the router.”

In fact, *Kidder* never determines a plurality of functional areas. *Kidder* does not, for example, teach querying a network device to discover functional areas. Rather, *Kidder* **assumes** that all network devices will have “five functional areas of network management as defined by the International Organization for Standardization.” *Kidder* at ¶ [0229], FIGs. 7a–7h (showing that the interface always includes each of the FCAPS buttons). *Kidder* presents an interface object for each of these five functional areas without ever determining if they are supported by a network device.

For at least the above reason, *Kidder* fails to teach or suggest at least one limitation of Claim 1. Therefore, *Kidder* does not anticipate Claim 1 under 35 U.S.C. § 102. Reconsideration is respectfully requested.

### **INDEPENDENT CLAIMS 2 AND 3**

Independent Claims 2 and 3 also recite the features quoted for Claim 1, although Claims 2 and 3 are expressed in another format. Claims 2 and 3 have all the features described above for Claim 1, and therefore Claims 2 and 3 are allowable over *Kidder* for the same reasons given above for Claim 1. Reconsideration is respectfully requested.

### **INDEPENDENT CLAIMS 4, 15, AND 26**

Independent Claim 4 recites steps similar to the first two steps quoted above for Claim 1, except that the recited steps are directed towards a “plurality of functional areas supported by network device.” Claim 4 is allowable over *Kidder* for at least the same reasons given above for Claim 1. Reconsideration is respectfully requested.

Independent Claims 15 and 26 recite the same features as Claim 4, although Claims 15 and 26 are expressed in another format. Claims 15 and 26 have all the features described above for Claim 4, and therefore Claims 15 and 26 are allowable over *Kidder* for the same reasons given above for Claim 4. Reconsideration is respectfully requested.

### **DEPENDENT CLAIMS 5–14, 16–25, AND 27–36**

Claims 5–14, 16–25, and 27–36 depend from Claims 4, 15, and 26, respectively, and include each of the above-quoted features by dependency. Thus, *Kidder* also lacks at least one feature found in Claims 5–14, 16–25, and 27–36. Therefore, *Kidder* does not anticipate Claims 5–14, 16–25, and 27–36. Reconsideration of the rejection is respectfully requested.

In addition, each of Claims 5–14, 16–25, and 27–36 recites at least one feature that independently renders it patentable. For example, Claim 7 recites “the machine-implemented step of launching one or more of a plurality of application programs to allow the user to modify the configuration data.” For instance, a user might click on a button for a particular user interface object. In response, a client implementing the steps of Claim 7 might automatically launch an external editing program that allows the user to modify the configuration data associated with the user interface object.

The Office Action alleges that *Kidder* teaches this step of Claim 7 in ¶ [0110]. However, the only “programs” discussed in ¶ [0110] are “NMS programs and programs executing on network devices.” *Kidder* says nothing about “launching” these programs “to allow the user to modify the configuration data,” much less implementing such a step with a machine. One skilled in the art would thus understand that only a user could launch these programs to modify configuration data. For at least this reason, *Kidder* does not anticipate Claim 7.

Also, Claim 8 recites “changing the visual appearance of the particular user interface object to indicate . . . that the configuration data . . . has been modified.” The Office Action alleges that *Kidder* discloses this step in ¶ [0219]. However, ¶ [0219] discloses only that the NMS client notifies a network manager of discrepancies between an NMS database and an actual device. *Kidder* says nothing about actually modifying “a particular user interface” that “corresponds to configuration data for [a] functional area.” Nor are *Kidder*’s “discrepancies” the same as “configuration data” that “has been modified.” For at least this reason, *Kidder* does not anticipate Claim 8.

Also, Claim 13 recites “determining a plurality of functional areas . . . for which the network device and a client have compatible configuration application program interfaces.” The Office Action alleges that *Kidder* discloses this step in ¶ [0110]. However, ¶ [0110] states only that APIs for the NMS programs and for the programs executing on network devices should be generated “from the same logical system model and associated code generation system.” *Kidder* says nothing about performing a step of “**determining**” that a “network device and a client have **compatible configuration application program interfaces**.”

In fact, there would be no reason for *Kidder*’s NMS clients to determine a plurality of functionality areas “for which the network device and a client have compatible configuration application program interfaces.” On *Kidder*’s network, the NMS clients and the programs on the network devices **will always have compatible APIs**, by virtue of the fact that the NMS clients and the programs on the network devices were generated “from the same logical system model and associated code generation system.” For at least this reason, *Kidder* does not anticipate Claim 13.

To expedite prosecution in light of the fundamental differences already identified, further arguments for each independently patentable feature of Claims 5–14, 16–25, and 27–36 are not

provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

## INDEPENDENT CLAIM 37

Claim 37 presently recites, among other elements:

in response to a user changing a value of **a configuration data item for one of the functional areas** to a new value, updating values of **the same configuration data item in the other functional areas** from the plurality of functional areas to the new value to create updated configuration data

The Office Action alleges that *Kidder* discloses this element on account of *Kidder*'s “bulletin board 970a,” discussed in *Kidder* at ¶ [0251]. *Kidder*'s bulletin board is mechanism by which a user may “consolidate several GUI screens and/or dialog boxes into a single view.” *Id.* at ¶ [0248]. In other words, the bulletin board allows a split screen view of multiple tabs from the NMS interface at one location. *Id.* at ¶ [0251]

The Office Action does not specifically allege what aspect of the bulletin board corresponds to Claim 37's “one of the functional area,” “new value,” “same configuration data item,” or “other functional areas.” This lack of clarity has forced Applicants to engage in guesswork as to the Office Action's meaning, with inconsistent results. For example, the Office Action previously alleged that *Kidder*'s FCAPS buttons were *Kidder*'s functional areas, but those buttons are not discussed in ¶ [0251].

Nonetheless, Applicants assume for the purposes of responding that the Office Action alleges that these aspects of Claim 37 are disclosed in the sentence “if the administrator changes any data in the items dragged to the bulletin board, the GUI is automatically updated and if any data in the GUI is changed, then any corresponding screens in the bulletin board are also updated.” *Id.* at ¶ [0251]. However, this sentence does not disclose that, as required by Claim 37, in response to “changing a value of a data item for one of the functional areas,” the “same configuration data item” is updated in “other functional areas.”

Rather, ¶ [0251] simply discloses that when a change is made to data in a tab that has been placed in the bulletin board, the same change is made to the data displayed in the tab under regular NMS interface. No data is changed in other functional areas. For example, as discussed in ¶ [0251], a user may drag the “ATM Stats In” tab to the bulletin board. If a user updates a

value in the “ATM Stats In” tab using the bulletin board interface, and then returns to the “ATM Stats In” tab under the normal NMS interface, the user will find that the same change has automatically been made to the value in the “ATM Stats In” tab under the normal NMS Interface. However, the data changed in the “ATM Stats In” tab in the bulletin board and the data updated in the “ATM Stats In” tab under the normal NMS interface **are both in the same functional area**. No change is made to data in a different functional area. Thus, *Kidder* fails to disclose “in response to a user changing a value of **a configuration data item for one of the functional areas** to a new value, updating values of **the same configuration data item in the other functional areas** from the plurality of functional areas to the new value.”

For at least the above reason, *Kidder* fails to teach or suggest at least one limitation of Claim 37. Therefore, *Kidder* does not anticipate Claim 37 under 35 U.S.C. § 102. Reconsideration is respectfully requested.

### INDEPENDENT CLAIM 39

Claim 39 presently recites, among other elements:

in response to detecting a user selection of a graphical user interface object associated with performing a **copy and paste operation**, overwriting values of one or more other data items from the first functional area with values of the one or more data items to create updated configuration data; and

The Office Action alleges that *Kidder* discloses this element on account of *Kidder*’s “bulletin board 970a,” discussed in *Kidder* at ¶¶ [0251] and [0252]. However, there is nothing in these paragraphs that discloses a “copy and paste operation.”

For at least the above reason, *Kidder* fails to teach or suggest at least one limitation of Claim 39. Therefore, *Kidder* does not anticipate Claim 39 under 35 U.S.C. § 102. Reconsideration is respectfully requested.

### INDEPENDENT CLAIM 40

Claim 40 presently recites, among other elements:

in response to detecting a user selection of a graphical user interface object associated with **performing a clone**

**operation**, generating a specified number of copies of the configuration data for a **specified number of other functional areas** to create updated configuration data; and

The Office Action alleges that *Kidder* discloses this element on account of *Kidder*'s "bulletin board," as discussed in *Kidder* at ¶ [0255]. Specifically, ¶ [0255] discusses how the bulletin board may provide views of a tab, such as the "ATM Stats In tab 963a," in multiple different formats simultaneously." However, there is nothing in this paragraphs that discloses "performing a **clone operation**," much less "generating a specified number of copies of configuration data for a specified number of other functional areas." In fact, since ¶ [0255] is directed specifically to alternatively formatted views of **a single tab**, ¶ [0255] fails to disclose any "**other functional areas**."

For at least the above reason, *Kidder* fails to teach or suggest at least one limitation of Claim 40. Therefore, *Kidder* does not anticipate Claim 40 under 35 U.S.C. § 102. Reconsideration is respectfully requested.

#### **DEPENDENT CLAIMS 38 AND 41–42**

Claims 38 and 41–42 depend from Claims 38 and 40, respectively, and include each of the above-quoted features by dependency. Thus, *Kidder* also lacks at least one feature found in Claims 38 and 41–42. Therefore, *Kidder* does not anticipate Claims 38 and 41–42. Reconsideration of the rejection is respectfully requested.

In addition, each of Claims 38 and 41–42 recites at least one feature that independently renders it patentable. For example Claim 42 recites "determining a value for a data item in one of the specified number of copies of the configuration data by applying an algorithm to a value for the data item in the configuration data." For example, a computer implementing the steps of Claim 42 might apply an algorithm to a particular column of a particular cloned data item that results in the particular column of the particular cloned data item having a unique value. The Office Action fails to specifically allege what aspect of *Kidder* corresponds to Claim 42's "algorithm." In fact, *Kidder* discloses no such algorithm.

To expedite prosecution in light of the fundamental differences already identified, further arguments for each independently patentable feature of Claims 38 and 41–42 are not provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

## **INDEPENDENT CLAIMS 43, 45, 46, 49, 51, AND 52**

Independent Claims 43 and 49 also recite the features quoted for Claim 37, although Claims 43 and 49 are expressed in another format. Claims 43 and 49 have all the features described above for Claim 37, and therefore Claims 43 and 49 are allowable over *Kidder* for the same reasons given above for Claim 37. Reconsideration is respectfully requested.

Independent Claims 45 and 51 also recite the features quoted for Claim 39, although Claims 45 and 51 are expressed in another format. Claims 45 and 51 have all the features described above for Claim 51, and therefore Claims 45 and 51 are allowable over *Kidder* for the same reasons given above for Claim 51. Reconsideration is respectfully requested.

Independent Claims 46 and 52 also recite the features quoted for Claim 40, although Claims 46 and 52 are expressed in another format. Claims 46 and 52 have all the features described above for Claim 40, and therefore Claims 46 and 52 are allowable over *Kidder* for the same reasons given above for Claim 40. Reconsideration is respectfully requested.

## **DEPENDENT CLAIMS 44, 47–48, 50, AND 53–54**

Claims 44, 47–48, 50, and 53–54 depend from Claims 43, 46, 49 and 52, respectively, and include each of the above-quoted features by dependency. Thus, *Kidder* also lacks at least one feature found in Claims 44, 47–48, 50, and 53–54. Therefore, *Kidder* does not anticipate Claims 44, 47–48, 50, and 53–54. Reconsideration of the rejection is respectfully requested.

Additionally, each of the dependent claims recites at least one additional feature that independently renders it patentable over *Kidder*. However, to expedite prosecution in light of the fundamental differences already identified, separate arguments for each independently patentable feature of Claims 44, 47–48, 50, and 53–54 are not provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

## **II. ADDED CLAIMS**

Claims 55–57 have been added. Claims 55–57 are supported by at least ¶¶ [0026]–[0028] and [0035] of the Specification. Claims 55–57 therefore do not introduce any new subject matter. Furthermore, Claims 55–57 are patentable over the cited references for at least the same reasons as Claim 4, from which they depend.

## CONCLUSION

It is respectfully submitted that all of the pending claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. If there are any additional charges, please charge them to Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

Respectfully submitted,  
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